

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Modifications to Market Dominant
Service Performance Measurement Plan

Docket No. PI2022-3

COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE
(May 18, 2022)

Pursuant to Order No. 6159, the Association for Postal Commerce (“PostCom”) submits these reply comments regarding modifications to the market dominant service performance measurement plan.

PostCom appreciates and commends any efforts by the Postal Service to increase the quantity of mail that is included in official measurement reporting. With one glaring exception, the changes proposed by the Postal Service appear to be a step in the right direction as they will result in more inclusive and standardized reporting across the Postal Service’s network.

The proposal to include reply mail in First-Class Mail service performance reporting is a clear improvement that the Commission should accept without qualification.

The proposed solution to the existing “long-haul exclusion” eliminates an arbitrary business rule that has long undermined the credibility of the Postal Service’s reporting.¹ The Commission should accept this proposal and encourage the Postal Service to reexamine other factors that limit inclusion of mail pieces in service reporting. For example, scan rates on flat shaped mail have declined, reducing the quantity of mail in measurement. The Postal Service could also improve the quality of reporting by making delivery data for pieces that are excluded from measurement available via its Informed Visibility platform.

¹ Docket No. PI2022-3, United States Postal Service Notice of Filing Changes to Service Performance Measurement Plan Document (“Notice”) at 3 (April 22, 2022).

PostCom does not question the claimed benefits of standardizing critical entry times (“CET”) for Periodicals.² On the other hand, the changes proposed by the Postal Service go well beyond mere changes in reporting. As proposed by the Postal Service, many existing Periodicals mailers will have their CETs advanced by many hours. If those mailers are unable to adjust their production and/or transportation schedules, they will experience an extra day of transit time as mail previously treated as having been entered on Day 0, will henceforth be treated as having been entered on Day 1.

Periodicals are time sensitive by definition, and as Periodicals mailers have had to contend with years of above-average rate increases, and below-average service performance, they have exhausted all available opportunities to reduce costs. Those Periodicals mailers who are able to comply with the new CETs are likely to incur additional costs to do so. The Commission should look askance at efforts by the Postal Service to shift costs onto mailers – de facto rate increases – in order to improve the perception of its service performance.

In fact, to the extent the proposed standardization of CETs creates entry times that Periodicals mailers cannot reasonably meet, it is a change in service standards for which the Postal Service is legally obligated to seek an Advisory Opinion from the Commission. While we acknowledge the Postal Service must have some operational leeway to adjust CETs without Commission review, it cannot be allowed to do so in such a way that effectively adds a day to the expected service for many mailers. It does not appear that the Postal Service made any attempt to assess the impact on affected mailers and it is likely that the changes in CET will have a disproportionate adverse effect on small rural periodicals, a category of mailers that is of bipartisan interest in Congress. Thus, arbitrarily changing the CETs in this situation not only

² See Notice at 1, 4.

adversely impacts mailers, but, like the business rules discussed above, obscures changes in actual service performance. Consequently, the Commission should reject this specific element of the Postal Service's otherwise commendable proposal.

Respectfully submitted,

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